

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;
Facebook Holdings, LLC; Facebook
Operations, LLC; Facebook Payments, Inc.;
Facebook Technologies, LLC; Instagram, LLC;
and Siculus, Inc.*

*Additional parties and counsel listed on
signature pages*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Honorable Peter H. Kang

**STIPULATION REGARDING
DESIGNATION OF CONFIDENTIAL
MATERIALS IN RE-PRODUCTION
DOCUMENTS**

1 Plaintiffs, Defendants Meta Platforms, Inc.; Facebook Holdings, LLC; Facebook Orations, LLC;
 2 Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc. (collectively,
 3 “Meta”), and Defendants TikTok Inc. and ByteDance, Inc. (collectively “TikTok”) submit this Joint
 4 Stipulation Regarding Designation of Confidential Materials in Re-Production Documents (“Stipulation
 5 on Confidentiality Designations”).

6 WHEREAS, on September 20, 2023 the Parties submitted letter-briefing [Dkt. No. 364] regarding
 7 a dispute over the timing for certain Defendants to apply confidentiality designations to documents
 8 previously re-produced in this litigation pursuant to the Court’s Order dated December 29, 2022 [Dkt. No.
 9 125];

10 WHEREAS, on November 22, 2023 the Court (Magistrate Judge Kang) set a hybrid discovery
 11 hearing for December 14, 2023 to hear the dispute presented at Dkt. No. 364 (along with two other
 12 disputes);

13 WHEREAS, the Parties have now reached an agreement that resolves the dispute over the timing
 14 for certain Defendants to apply confidentiality designations presented at Dkt. No. 364. Under the
 15 agreement, Defendants Meta and TikTok will re-produce the documents originally produced in response
 16 to the Court’s December 29, 2022 Order with confidentiality designations applied in accordance with the
 17 Protective Order appearing at Dkt. No. 290. In addition, Meta and TikTok will, in accordance with that
 18 Protective Order [Dkt. No. 290], apply confidentiality designations to any forthcoming updates to prior
 19 re-productions they have agreed to make, consistent with the Court’s December 29, 2022 Order; and

20 THEREFORE, the Parties notify the Court that the dispute briefed at Dkt. No. 364 is moot and
 21 need not be heard at the December 14, 2023 hybrid discovery hearing before Magistrate Judge Kang.

22
 23
 24 DATED: December 11, 2023

Respectfully submitted,

25 **COVINGTON & BURLING LLP**

26 /s/ Ashley M. Simonsen
 27 Ashley M. Simonsen, SBN 275203
 28 COVINGTON & BURLING LLP

1 1999 Avenue of the Stars
2 Los Angeles, CA 90067
3 Telephone: (424) 332-4800
4 Facsimile: + 1 (424) 332-4749
5 Email: asimonsen@cov.com

6 Phyllis A. Jones, *pro hac vice*
7 Paul W. Schmidt, *pro hac vice*
8 COVINGTON & BURLING LLP
9 One CityCenter
10 850 Tenth Street, NW
11 Washington, DC 20001-4956
12 Telephone: + 1 (202) 662-6000
13 Facsimile: + 1 (202) 662-6291
14 Email: pajones@cov.com
15 Email: pschmidt@cov.com

16 Emily Johnson Henn, SBN 269482
17 COVINGTON & BURLING LLP
18 3000 El Camino Real
19 5 Palo Alto Square, 10th Floor
20 Palo Alto, CA 94306
21 Telephone: + 1 (650) 632-4700
22 Facsimile: +1 (650) 632-4800
23 Email: ehenn@cov.com

24 *Attorneys for Defendants Meta Platforms, Inc.;*
25 *Facebook Holdings, LLC; Facebook Operations,*
26 *LLC; Facebook Payments, Inc.; Facebook*
27 *Technologies, LLC; Instagram, LLC; and Siculus,*
28 *Inc.*

KING & SPALDING LLP

21 /s/ Geoffrey M. Drake
22 Geoffrey M. Drake
23 King & Spalding LLP
24 1180 Peachtree Street, NE, Suite 1600
25 Atlanta, GA 30309
26 Telephone: + 1 (404) 572-4600
27 Facsimile: + 1 (404) 572-5100
28 Email: gdrake@kslaw.com

FAEGRE DRINKER LLP

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson
Faegre Drinker LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

*Attorneys for Defendants TikTok Inc. and
ByteDance Inc.*

/s/ Christopher A. Seeger

Christopher A. Seeger, *pro hac vice*
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

Lexi J. Hazam (SBN 224457)
**LIEFF CABRASER HEIMAN
& BERNSTEIN LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-356-1000
lhazan@lchb.com

Previn Warren, *pro hac vice*
MOTLEY RICE, LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Plaintiffs' Co-Lead Counsel

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 11, 2023

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen